

REMARKS

Status of Claims

Claims 1, 4, 7, 10, 12, 14 and 16-19 have been amended to correct informalities. Claims 1-19 remain pending in this application. Applicants respectfully request further examination of the application, as amended.

Examiner Interview Summary

On July 12, 2006, a telephonic Examiner Interview took place between the Examiner and Applicants' undersigned representative. It was discussed whether the Examiner's characterization of the International Mobile Subscriber Identity (IMSI) mentioned in *Muhonen* (U.S. Patent Application Publication No. 2005/0014500 A1) as a "temporary dialable number" is reasonable. No agreement was reached, but the Examiner indicated she would consider the argument when presented in a written Response.

Objections to Claims 1, 12, 14 and 16

Claims 1, 12, 14 and 16 stand objected to because of certain informalities identified by the Examiner. Applicants thank the Examiner for suggesting corrections to correct the informalities and provide consistency of terminology, and have accordingly amended these claims as well as claims 7, 10 and 17-19, which include similar informalities.

Rejection of Claim 4 under 35 U.S.C. § 112

Claim 4 stands rejected under 35 U.S.C. § 112, second paragraph, due to the terms "said geographic location" and "said location information" lacking clear antecedent basis. Applicants have amended this claim and believe this overcomes the rejection.

Rejection of Claims 1-3, 5-8 and 10-19 under 35 U.S.C. § 102(e) – Muhonen

Claims 1-3, 5-8 and 10-19 stand rejected under 35 U.S.C. § 102(e) as being anticipated by *Muhonen* (U.S. Patent Application Publication No. 2005/0014500 A1). Applicants respectfully traverse this rejection.

Applicants respectfully disagree with the Examiner's statement that "the IMSI of the target UE is fairly characterized as a temporary dialable number." As well-understood in the art, an International Mobile Subscriber Identity (IMSI) is not a

"dialable number." (See, e.g., "Save The MINs," *Wireless Review*, July 1, 2001, http://telephonyonline.com/wireless/mag/wireless_save_mins/index.html; "Seamless Emergency Service for International and Domestic Roamers," *IFAST Journal*, March 2003, p. 1, <http://www.ifast.org/files/Journal/ifastjournal-march2003.pdf> ("The Mobile Station Identification (MSID) could be a Mobile Identification Number (MIN), an International Roaming MIN (IRM) or an International Mobile Subscription Identification (IMSI). None of these are dialable numbers." (emphasis added)).) As indicated by the above-cited articles, a quick on-line search on the keyword "IMSI" will reveal many instances in which it is explained that an IMSI is not a "dialable number."

An IMSI consists of a Mobile Country Code, which identifies the country in which the mobile network is based, a Mobile Network Code, which uniquely identifies the network, and a unique Mobile Station Identification Number, which uniquely identifies the subscriber within the network's customer or subscriber base. None of these constituent elements is dialable. A dialable number is what a person dials on the telephone keypad and colloquially refers to as a "telephone number" or "phone number." For example, the North American Numbering Plan (NANP) defines the format for dialable numbers in the United States, Canada and many Caribbean nations. (See, e.g., http://en.wikipedia.org/wiki/North_American_Numbering_Plan.) NANP numbers take the form of a three-digit area code plus a seven-digit number, such as 571-555-1234.

Under the applicable standards (e.g., GAIT) that form the background against which the present invention is set, a "temporary dialable number," such as a Temporary Local Directory Number (TLDN), is needed to ensure that calls can be routed to a subscriber roaming on a foreign-technology network. For this reason, the term "temporary dialable number" is explicitly recited in the claims rather than some more general terminology. To use an example described in Applicants' specification, when receiving a call to a TDMA subscriber who is roaming on a GSM network, the TDMA home network requests a Temporary Local Directory Number, i.e., a dialable number, from the Interworking and Interoperability Function (IIF). To satisfy the requirements of the home network to handle the call, the IIF acts as the Home Location Register (HLR) for the visited network on which the subscriber is roaming. In this capacity, the IIF translates the request into a GSM-protocol request to Provide

Routing Number (PRN). The visited GSM network responds by providing a TLDN, i.e., a temporary dialable number or roaming number. As a result of this exchange of messages, the call can be routed from the TDMA home network Mobile Switching Center to the visited GSM network Mobile Switching Center. The important point to note is that, under the multi-technology roaming scheme (e.g., the GAIT standard or similar) that forms the background against which the present invention is set, the home network requires a temporary dialable number to be able to handle the call in this manner. An IMSI, as that term is understood in the art and as used in Applicants' specification, is not characterizable as a "temporary dialable number," as it is neither temporary nor dialable.

To establish *prima facie* obviousness of a claimed invention, all claim limitations must be taught or suggested by the prior art. MPEP 2143.03 (citing *In re Royka*, 490 F.2d 981, 180 U.S.P.Q. 580 (CCPA 1974) ("All words in a claim must be considered in judging the patentability of that claim against the prior art.")). Absent any teaching in the prior art of record of determining the identity of the equipment serving a multi-technology wireless device by using a temporary dialable number that has been obtained, the invention as claimed in claims 1-3, 5-8 and 10-19 could not have been obvious to a person of ordinary skill in the art.

For at least the reasons discussed above, Applicants respectfully request reconsideration and withdrawal of this rejection.

Rejection of Claims 4 and 9 under 35 U.S.C. §103(a) – Muhonen and Naghian

Claims 4 and 9 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over *Muhonen* in view of *Naghian* (U.S. Patent No. 2003/0148774 A1). Applicants respectfully traverse this rejection for at least the same reasons discussed above with regard to the claims from which claims 4 and 9 depend.

Naghian relates to locating a wireless device within a network, but like *Muhonen*, does not teach or suggesting using a temporary dialable number that has been obtained to determine the identity of the equipment serving the device. Absent any teaching in either *Muhonen* or *Naghian* of this limitation, the invention as claimed in claims 4 and 9 could not have been obvious to a person of ordinary skill in the art in view of the combination of references. For at least this reason, Applicants respectfully request reconsideration and withdrawal of this rejection.

CONCLUSION

In view of the foregoing, it is respectfully submitted that all grounds of rejection have been overcome and/or traversed. Applicant therefore respectfully solicits allowance of the application. Should there be any further questions or concerns, the Examiner is urged to telephone the undersigned.

Respectfully submitted,

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